

REMARKS

Claims 1-33 and 35 are pending in this application. By this Amendment, claims 9, 16, 17, 20-27, 29-33, and the specification, are amended. Claim 34 is canceled without prejudice or disclaimer of the subject matter recited in that claim. No new matter is added by these amendments. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

The Office Action, in paragraph 1, objects to the specification because of formalities. The specification is amended as suggested in the Office Action. Withdrawal of the objection to the specification is respectfully requested.

The Office Action, in paragraph 4, rejects claim 34 for allegedly being directed to non-statutory subject matter. The cancellation of claim 34 renders this rejection moot.

The Office Action, in paragraph 13, indicates that claims 4-7, 12-15, 20-23 and 28-31 recite allowable subject matter. Specifically, these claims are indicated as allowable if rewritten in independent form to include all of the features of the base claim and any intervening claims. Applicant appreciates this indication of allowability, but respectfully submits that at least independent claims 1 and 18, from which these claims depend, are allowable for at least the reasons indicated below.

The Office Action, in paragraph 6, rejects claims 1, 2, 8-11 and 24-27 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,701,369 to Moon et al. (hereinafter "Moon"). The Office Action, in paragraph 8, rejects claims 3 and 9 under 35 U.S.C. §103(a) as being unpatentable over Moon in view of the article "Fractal Image Coding: A Review," Proceedings of the IEEE, Vol. 81, No. 10, Oct. 1993, pages 1451-1465, (hereinafter "Jacquin"). The Office Action, in paragraph 9, rejects claims 16, 17, 32 and 33 under 35 U.S.C. §103(a) as being unpatentable over Moon in view of U.S. Patent No. 6,002,794 to Bonneau et al. (hereinafter "Bonneau"). The Office Action, in paragraph 12, rejects claims 34

and 35 under 35 U.S.C. §103(a) as being unpatentable over Moon. Applicants respectfully traverse these rejections.

Claims 1, 18 and 35 recite, among other features, an improved domain block forming section for performing a pixel value conversion with respect to the reduced range block image formed by the reduced range block forming section. At least this feature cannot reasonably be considered to be taught, or to have been suggested, by Moon.

The Office Action asserts that Moon teaches features that can reasonably be considered to correspond to the above-quoted features of claims 1, 18 and 35. This assertion is incorrect for at least the following reasons.

Moon teaches, in Fig. 5, reading of a range block with a predetermined size, for example, B x B pixel data values. Further, Moon teaches in col. 5, lines 56-61 spatially transforming the domain block (D1) using a reduction ratio of $\frac{1}{4}$ so that all pixel data of the domain block (D1) corresponds one-to-one with the pixel data of range block (Ri). The slope and offset detector then calculates the slope and the offset values of the contractive transformation function corresponding to domain block (D1). Additionally, the mean square error between the data of the spatially transformed domain block (D1) and the data of range block (Ri) is calculated. However, Moon fails to teach performing a pixel value conversion with respect to the spatially transformed domain block (D1). Specifically, calculating slope, offset and mean square error of data cannot reasonably be considered to correspond to a pixel value conversion of such data.

The Office Action merely applies Jacquin and Bonneau for allegedly disclosing features of dependent claims. However, Jacquin and Bonneau fail to cure the deficiencies of Moon with respect to the above-quoted feature of claims 1, 18 and 35.

For at least the above reasons, Moon, Jacquin and Bonneau cannot reasonably be considered to teach, or to have suggested, the combinations of all of the features recited in at

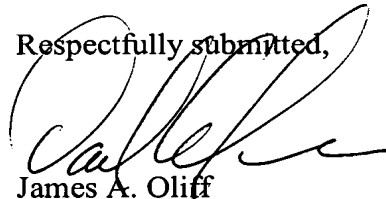
least independent claims 1, 18 and 35. Further, claims 2-17 and 19-33 would also not have been suggested by the applied references for at least the respective dependence of these claims on allowable independent claims 1 and 18, as well as for the separately patentable subject matter that these claims recite.

Accordingly, reconsideration and withdrawal of the rejections of claims 1-3, 8-11, 16-19, 24-27, 32, 33 and 35 under 35 U.S.C. §§ 102(e) and 103(a) as being anticipated by, or unpatentable over, the applied references are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-3, 8-11, 16-19, 24-27, 32, 33 and 35, in addition to the indicated allowability of claims 4-7, 12-15, 20-23 and 28-31, are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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